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Attorneys for Defendant  
AUTONOMY CORPORATION PLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GA ESCROW, LLC, a Delaware limited  
liability company, as Representative for the  
Escrow Participants,

Plaintiff,

v.

AUTONOMY CORPORATION PLC, a  
corporation formed under the laws of  
England and Wales,

Defendant.

Case No. C08-01784-SI

**STIPULATION AND PROPOSED ORDER  
FOR EXTENSION OF DISCOVERY  
CUTOFF AND MODIFICATION OF  
PRETRIAL PREPARATION ORDER**

Dept.: 10

**Judge: The Honorable Susan Illston**

Plaintiff GA Escrow, LLC (“GA Escrow” or “Plaintiff”) and defendant Autonomy Corporation PLC (“Autonomy” or “Defendant”) respectfully submit this Stipulation and Proposed Order for Extension of Discovery Cutoff and Modification of Pretrial Preparation Order.

**1. Settlement and ADR.**

The parties have participated in three settlement conferences before Judge Spero - the first on August 18, 2009, the second on October 7, 2009, and the third of March 4, 2010. Although no settlement has been reached, the parties agreed to continue to discuss the possibility for a resolution of this matter, and agreed to schedule an additional conference before Judge Spero either following expert discovery or after the filing of dispositive motions.

**2. Scheduling.**

On September 8, 2009, this Court, pursuant to a stipulation of the parties, signed an order staying all discovery and corresponding discovery deadlines in this matter. On December 14, 2009, the Court signed a Second Pretrial Preparation Order setting new discovery deadlines and a trial date of July 26, 2010. A copy of that order is attached hereto as Exhibit A. Consistent with that order Non-Expert Discovery is to close Friday, March 12, 2010. Due to a death in the family of Plaintiff’s counsel, depositions in New York scheduled for the week of March 8, 2010 had to be rescheduled. This also has required the rescheduling of other depositions. Counsel for defendant graciously has agreed to stipulate to a two week extension of the fact discovery cutoff and corresponding expert discovery deadlines to accommodate these rescheduled depositions. The requested modification does not impact the date for filing dispositive motions or the trial date. As such, the parties respectfully request that the Pretrial Preparation Order be modified to conform to the following revised case schedule:

Fact discovery closes:	March 31, 2010
Expert disclosures:	April 9, 2010
Rebuttal expert disclosures:	April 23, 2010
Expert discovery closes:	May 4, 2010

Last day to file dispositive motions: May 14, 2010

Opposition Due: May 28, 2010

Reply Due: June 4, 2010

Hearing Date no later than: June 18, 2010

Pretrial Conference: July 13, 2010

Trial: July 26, 2010

DATED: March 5, 2010

SHARTSIS FRIESE LLP

By: /s/ Gregg S. Farano  
GREGG S. FARANO

Attorneys for Plaintiff  
GA ESCROW, LLC

DATED: March 5, 2010

DOLL AMIR & ELEY LLP

By: /s/ Gregory Lawrence Doll  
(with permission)  
GREGORY LAWRENCE DOLL

Attorneys for Defendant  
AUTONOMY CORPORATION PLC

**ORDER**

Pursuant to the parties' stipulation, and good cause appearing therefore, IT IS HEREBY ORDERED that the following case schedule be adopted:

1. The Parties shall complete non-expert discovery no later than March 31, 2010.
2. The Parties shall designate experts no later than April 9, 2010.
3. The Parties shall designate rebuttal experts no later than April 23, 2010;
4. The Parties shall complete expert discovery no later than May 4, 2010;
5. The Parties shall file dispositive motions no later than May 14, 2010;
6. The Pre-Trial Conference for this matter will take place on July 13, 2010; and
7. The Trial for this matter will commence on July 26, 2010.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_



The Honorable Susan Illston  
United States District Judge

**ECF CERTIFICATION**

I, Gregg S. Farano, am the ECF User whose identification and password are being used to file this Stipulation and Proposed Order for Extension of Discovery Cutoff and Modification of Pretrial Preparation Order. In compliance with General Order 45.X.B, I hereby attest that Gregory Lawrence Doll has concurred in this filing.

DATED: March 5, 2010

SHARTSIS FRIESE LLP

By: /s/ Gregg S. Farano  
GREGG S. FARANO  
Attorneys for Plaintiff  
GA ESCROW, LLC

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